

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13  
: :  
EDWARD J. FORTESCUE, : BKY NO. 09-12545 JKF  
SR. and JILL L. FORTESCUE, :  
Debtors :  
:

**ORDER**

AND NOW, this \_\_\_\_\_, day of \_\_\_\_\_, 2009, upon consideration of the Amended Application for Compensation and Reimbursement of Expenses filed by Debtors' Counsel requesting compensation in the amount of \$2,500.00, and the response and hearing thereto, if any, it is ORDERED that the Application is GRANTED.

\_\_\_\_\_  
Jean K. FitzSimon  
United States Bankruptcy Judge

Attorney for Debtors:  
Morton J. Grabel, Esquire  
2240 DeKalb Pike, Suite #3  
Norristown, PA 19401

Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

Chapter 13 Trustee:  
William C. Miller  
111 Independence Mall  
Suite 583  
Philadelphia, PA 19106

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**APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**  
**BY MORTON J. GRABEL, ESQUIRE**

Morton J. Grabel, Esquire, counsel for Debtor, applies under §330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents as follows::

1. Applicant is counsel for debtors.
2. Debtors filed a petition under Chapter 13 of the Bankruptcy Code on April 4, 2009.
3. Debtors' annualized current monthly income as set forth on form B22C is below the median income.
4. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of debtors, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.
5. Applicant requests an award of compensation of \$2,500.00 for 6 hours expended by Applicant at the rate of \$250.00 per hour and 10 hours expended by Applicant's Certified Paralegal at the rate of \$100.00 per hour in providing the following services
  - Description of relief available under Chapter 7 or Chapter 13 of the Bankruptcy Code and description of how the bankruptcy process works.
  - Meetings and communications with debtor(s).
  - Review and analysis of debtor(s) financial situation.
  - Computation of debtor(s) average monthly income based on income for the past 6 months.
  - Computation of the Means Test.

- Due diligence review of bank statements, credit card statements, tax returns, prior bankruptcies, mortgages, judgments and other liens of record; homeowners' insurance, automobile insurance, and credit report.
  - Preparation and filing of the bankruptcy petition, schedules of assets and liabilities, income and expenses, statement of financial affairs, and means test.
  - Preparation of Chapter 13 Plan and amendments thereto, if necessary.
  - Responding to creditors' inquiries.
  - Representation at Meeting of Creditors and Confirmation of Chapter 13 Plan.
  - Preparation and filing of objection to the claim of debtor(s) mortgage holder and negotiating a settlement.
  - Responding to and negotiating Objections to Chapter 13 Plan.
6. Applicant requests reimbursement of expenses in the amount of \$00.00 for the following expenses: none.
7. Debtors paid Applicant \$2,500.00 prior to the filing of the petition.
8. A copy of the Applicant's disclosure of compensation pursuant to Fed. R. Bankr. P. 2016(b) is attached hereto as Exhibit "A".
9. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C. §504(c) applies.

WHEREFORE, Applicant requests an award of \$2,500.00 in compensation and of \$00.00 in reimbursement of actual, necessary expenses.

Dated: 6/15/09

/s/ Morton J. Grabel  
Morton J. Grabel  
Attorney for Debtor  
2240 DeKalb Pike, Suite 3  
Norristown, PA 19401  
Phone: 610-275-4420  
Fax: 610-275-7031

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IN RE:	: CHAPTER 13	
EDWARD J. FORTESCUE,	: BKY NO. 09-12545 JKF	
SR. and JILL L. FORTESCUE,	:	
Debtors	:	

**CERTIFICATE OF SERVICE**

I, Morton J. Grabel, attorney for the Debtor, hereby certify that a true and correct copy of the foregoing Amended Application was served on the interested parties identified below by electronic means or by placing copies thereof in the United States First Class mail, postage prepaid on or about the date indicated below:

Debtors:  
Edward J. Fortescue  
Jill L. Fortescu  
1517 Mulhlenburg Drive  
Blue Bell, PA 19422

Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

Chapter 13 Trustee:  
William C. Miller  
111 Independence Mall  
Suite 583  
Philadelphia, PA 19106

Dated: 6/15/09

/s/ Morton J. Grabel, Esquire  
Morton J. Grabel, Esquire

United States Bankruptcy Court  
Eastern District of Pennsylvania

In re **Edward J Fortescue, Sr**  
**Jill L Fortescue**

Debtor(s)

Case No. **09-12545**  
Chapter **13**

**DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)**

1. Pursuant to 11 U.S.C. § 329(a) and Bankruptcy Rule 2016(b), I certify that I am the attorney for the above-named debtor and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept.....	\$	<u>2,500.00</u>
Prior to the filing of this statement I have received.....	\$	<u>2,500.00</u>
Balance Due.....	\$	<u>0.00</u>

2. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify):

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify):

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- [Other provisions as needed]

**Negotiations with secured creditors to reduce value of claims and enter into Reaffirmation Agreements; preparation and filing of motions pursuant to 11 USC 522(f)(2)(A) for avoidance of liens on household goods.**

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

**Defending Motions for Relief from the Automatic Stay; Defending Motions to Determine Dischargeability of Debt; Defendant Motions for Dismissal by creditors; Prosecuting or defending adversarial actions; Preparation and filing of Motions to Avoid Liens; Court appearances other than Meeting of Creditors and Confirmation of Plan**

**CERTIFICATION**

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

Dated: May 6, 2009

/s/ Morton J. Grabel

Morton J. Grabel 37936  
Morton J. Grabel, Esquire  
2240 DeKalb Pike  
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Norristown, PA 19401  
610-275-4420 Fax: 610-275-7031  
mortgrabel@aol.com